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9 **BEFORE THE**  
10 **BOARD OF REGISTERED NURSING**  
11 **DEPARTMENT OF CONSUMER AFFAIRS**  
**STATE OF CALIFORNIA**

12 In the Matter of the Accusation Against:

Case No. *2013-750*

13 **ERIK CHRISTOPHER BROWN**  
14 **8877 Spectrum Center Blvd. Apt. #11310**  
**San Diego, CA 92123**

**A C C U S A T I O N**

15 **Registered Nurse License No. 644175**

16 Respondent.

17  
18 Complainant alleges:

19 **PARTIES**

20 1. Louise R. Bailey, M.Ed., RN (Complainant) brings this Accusation solely in her  
21 official capacity as the Executive Officer of the Board of Registered Nursing, Department of  
22 Consumer Affairs.

23 2. On or about September 1, 2004, the Board of Registered Nursing issued  
24 Registered Nurse License Number 644175 to Erik Christopher Brown (Respondent). The  
25 Registered Nurse License expired on March 31, 2006, and has not been renewed.

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1 being renewed or reinstated. If a case settles, recovery of investigation and enforcement costs  
2 may be included in a stipulated settlement.

3 **FIRST CAUSE FOR DISCIPLINE**

4 **(Out Of State Discipline)**

5 8. Respondent has subjected his Registered Nurse License to disciplinary action  
6 under Code section 2761, subdivision (a)(4), in that his license to practice nursing in North  
7 Carolina was disciplined by the State of North Carolina Board of Nursing (North Carolina  
8 Board) in a disciplinary action, which resulted in his license being voluntarily surrendered. The  
9 circumstances are as follows:

10 9. The North Carolina Board issued registered nurse permanent license number RN  
11 235541 to Respondent.

12 10. On April 11, 2011, the North Carolina Board took disciplinary action against  
13 Respondent's registered nurse permanent license in a matter entitled, Acceptance of Voluntary  
14 Surrender, by accepting Respondent's voluntary surrender of his nursing license and making  
15 such surrender a public record under the North Carolina Public Record Statute, General Statutes  
16 Chapter 132 and North Carolina Board policy.

17 11. The facts that led to the discipline are as follows. On April 11, 2011, Respondent  
18 submitted a letter to the North Carolina Board stating his desire to voluntarily surrender his  
19 license to practice nursing in North Carolina. Respondent understood that the voluntary  
20 surrender of a license is considered a discipline action and by voluntarily surrendering the  
21 license, he was waiving all rights to seek judicial review as to otherwise challenge the validity of  
22 the discipline action.

23 12. On April 11, 2011, the North Carolina Board entered an Acceptance of Voluntary  
24 Surrender for Respondent as its order in resolution of the disciplinary action. In the Acceptance  
25 of Voluntary Surrender, Respondent voluntarily surrendered his permanent license to practice as  
26 a registered nurse in the state of North Carolina for at least one year. Respondent was required to  
27 meet all conditions of reinstatement as outlined by the North Carolina Board.

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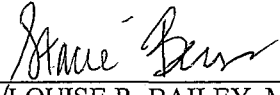
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1           1.       Revoking or suspending Registered Nurse License Number 644175, issued to  
2 Erik Christopher Brown;

3           2.       Ordering Erik Christopher Brown to pay the Board of Registered Nursing the  
4 reasonable costs of the investigation and enforcement of this case, pursuant to Business and  
5 Professions Code section 125.3;

6           3.       Taking such other and further action as deemed necessary and proper.  
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10 DATED: March 13, 2013

*for*   
LOUISE R. BAILEY, M.ED., RN  
Executive Officer  
Board of Registered Nursing  
Department of Consumer Affairs  
State of California  
Complainant

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